

Exhibit 3

Page 1

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4

5 IN RE FTCA Flint Water Cases

6 Civil Action No.

7 4:17-cv-11218

8 (consolidated)

9 Hon. Linda V. Parker

10

11 The Video Recorded Remote Deposition of

12 JULIE E. GOODMAN, Ph.D.

13 Taken Via Golkow/Veritext Remote

14 Commencing at 10:00 a.m.

15 Wednesday, September 18, 2024

16 Before Robin D. Gadwa, CSR 2607, RPR, FPR, FAPR

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18
19 Court reporter, attorneys & witness appearing remotely.
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Page 2

1 APPEARANCES:

2 MR. PATRICK HAINES

3 Napoli Shkolnik PLLC

4 360 Lexington Avenue, 11th Floor

5 New York, New York 10017

6 (212) 397-1000

7 planciotti@napolilaw.com

8 Appearng on behalf of the Plaintiffs.

9 MS. CARY S. MCGEHEE

10 Pitt McGehee Palmer & Rivers, PC

11 117 W. Fourth Street, Suite 200

12 Royal Oak, Michigan 48067

13 (248) 398-9800

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15 Appearng on behalf of the Plaintiffs.

16 MS. DEBORAH LABELLE

17 Law Offices of Deborah A. Labelle

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19 Ann Arbor, Michigan 48104

20 (734) 996-5620

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22 Appearng on behalf of the Plaintiffs.

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24

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Page 3

1 APPEARANCES CONTINUED:

2 MR. TIMOTHY B. WALTHALL

3 Trial Attorneys, Environmental Torts

4 U.S. Department of Justice

5 P.O. Box 340

6 Washington, D.C. 20044

7 (202) 616-4221

8 Appearng on behalf of the Defendants.

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10 VIDEOGRAPHER: PHILLIP TODD

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1 JULIE GOODMAN, PH.D.

2 having been first duly sworn, was examined and
3 testified on her oath as follows:

4 DIRECT EXAMINATION

5 BY MR. HAINES:

6 Q Dr. Goodman, good morning. My name is Patrick Haines.
7 I'm with the law firm of Napoli Shkolnik for the
8 Plaintiffs. I'm going to ask you just a few questions
9 here. I don't think this will go terribly long, but
10 if you need to take a break at any point, just please
11 let us know, we're here at your discretion so if you
12 need to do anything or take a break or take a call,
13 that's totally fine.

14 A Okay. Thank you.

15 Q Where are you located today?

16 A In Canton, Massachusetts.

17 Q My understanding is you have been retained to testify
18 as an expert witness in this case. Is that your
19 understanding as well?

20 A Yes.

21 Q Could you just as a general matter state what you
22 understand the scope of your testimony to be in this
23 case?

24 A My scope was to evaluate whether lead in water in
25 Flint contributed to any, contributed to increased

Page 7

1 blood lead levels and then adverse health effects
2 generally in the Plaintiffs.

3 Q Okay. And you are a doctor, but not a medical doctor;
4 correct?

5 A That is correct.

6 Q Nothing wrong with. A Ph.D. is pretty hard to get
7 too. So I'm sure you worked hard to get it. But I
8 just want to make clear. We understand. What was
9 your Ph.D. in, Doctor?

10 A It was in environmental health sciences specializing
11 in toxicology.

12 Q Okay. So you are a toxicologist; is that the best
13 title that you feel?

14 A Well, I have expertise in both toxicology and
15 epidemiology.

16 Q Okay.

17 A So. Yes.

18 Q Okay. My understanding is you work with a company
19 called Gradient; is that correct?

20 A Yes.

21 Q Can you explain to me what Gradient is?

22 A Gradient is a health sciences and risk assessment
23 consulting firm.

24 Q Okay. And the paperwork describes you as a principal
25 at Gradient. Is there something -- what's the

Page 28

1 CERTIFICATE OF NOTARY

2 STATE OF MICHIGAN)

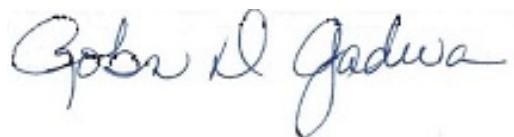
3) SS

4 COUNTY OF OAKLAND)

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6 I, Robin D. Gadwa, Certified Shorthand

7 Reporter, a Notary Public in and for the above county
8 and state, do hereby certify that the above deposition
9 was taken before me at the time and place hereinbefore
10 set forth; that the witness was by me first duly sworn
11 to testify to the truth, and nothing but the truth,
12 that the foregoing questions asked and answers made by
13 the witness were duly recorded by me stenographically
14 and reduced to computer transcription; that this is a
15 true, full and correct transcript of my stenographic
16 notes so taken; and that I am not related to, nor of
17 counsel to any of the parties, nor interested in the
18 event of this cause.

19 

20 _____
21 ROBIN D. GADWA, CSR-2607, RPR, FPR, FAPR

22 Notary Public

23 Oakland County, Michigan

24 My commission expires: 12-08-2026